1 Is there a paragraph you'd like me to study? 2 Let me read to you what I'm concerned with 3 and then you can tell me whether or not you had read this on or about the time that it, it came out. 5 Α Yes. 6 Following beloved partners, "this glorious word of 0 7 the Lord given to us as a word of -- seven years ago is literally coming to pass. 1981 has started with a bang. Two news Translator TV stations, Bakersfield and Arvin-Lamont, 10 California, are on the air. Last year, 1980, saw 10 new 11 stations go on the air, almost one a month. Praise the Lord. 12 We have filed new FCC applications for 25 more cities across 13 America and applications for 15 more are in preparation." 14 Now, that's the part I'm concerned with. 15 Α Yes. 16 Q Now, did you read this newsletter on or about the 17 time it came out? 18 Α I have no recollection of seeing this newsletter 19 before. 20 Q I'd like you to turn to Mass Media Exhibit 39. 21 I'm there. Α 22 The part that I'm concerned with is on the bottom of Q 23 the first page, beginning with the word "of course." 24 you know, it's not a complete sentence. I couldn't find --25 Α I see that.

1 | Q -- page 2.

- 2 A Okay, I've read that, that part of the sentence.
- Q Now, do you recall reading this document on or about the time that it became available?
- 5 A No, I don't.
- Q I'd like you to turn to Mass Media Exhibit 40. The part that I'm concerned with is on the first page, the second full paragraph, the first sentence, beginning with "Partners, please pray."
- 10 A Yes, I've read that.
- 11 Q Do you recall reading this on or about the time it 12 was published?
- 13 A No, I, I don't.

17

18

19

20

21

22

- Q Sitting here now, do you have any knowledge as to what that sentence is referring to in terms of "file for 26 more of these new satellator stations"?
 - A Satellator, to me, was a phrase that I'd heard used in conjunction with Spanish International Network. I think they coined the phrase and someone had told me that that referred to these -- to low-power stations that could be used for local programming. That's what I think of as a satellator.
- Q And do you know who it is or what entity it is that is filing for the 26 satellator stations that are referred to here?

1 A I, I don't. I would assume it would be one of those 2 stations listed at the beginning of the newsletter.

- Q Right. No, my question was did you know --
- 4 A No, I didn't know. I don't know who did.
- 5 Q Next, I'd like you to turn to Mass Media Exhibit 48.
- 6 A Yes, I'm there.
- Q Excuse me. I have the wrong number. It's Mass Media
- 8 Exhibit 49. I'm sorry.
- 9 A Thank you.

3

16

- Q What I'd like you to focus on is the listing of projects that begins on page 13. First of all, you've seen such listings before, have you not?
- 13 A You know, I don't -- I've seen these little boxes,
 14 usually at the end of the year, in terms of the different
 15 programmers. I, I honestly don't remember a box here where

somebody was to air amount for a pledge.

- Q All right. What I'd like you to look at is the -- on page 17, the right-hand column, the fourth entry down.
- 19 A Felicidad?
- Q Yes.
- 21 A Yes, I've read that.
- Q Now, do you know what is being referred to when it says "David is a board member of our Satellite Division"?
- A I've never seen that phrase used before, Satellite
 Division.

1	Q	Do you know what it's referring to?
2	A	The only thing that I can think of is Translator TV.
3	I mean,	that would be my conclusion. If, if you were to put
4	David E	spinoza together, that's the only responsibility he had
5	was Tra	nslator TV.
6	Q	Well, in other words, Satellite Division isn't
7	referri	ng to something else?
8	A	I know of nothing else that it could refer to.
9	Q	Is this the first time that you've seen this?
10	A	I have to admit counsel showed that to me.
11	Q	Prior to the time counsel showed it to you And I
12	take it	when you say counsel showed it to you, you mean some
13	time wi	thin the last couple of weeks?
14	A	No, a couple of days.
15	Q	All right. Prior to then
16	A	No, I've never seen it before.
17	Q	You've never seen this before?
18	A	No.
19	Q	Now, please turn to page 18, the left-hand column,
20	fourth (entry.
21	A	Yes. I've read that.
22	Q	Now
23		MR. SHOOK: That's on page 18.
24		MR. COHEN: Thank you.
25		BY MR. SHOOK:

1	Q	Have you ever seen this reference before?
2	A	No.
3	Q	Outside of perhaps counsel showing it to you within
4	the last	
5	A	That wasn't shown to me by counsel. I've never seen
6	that bef	ore now.
7	Q	You've never seen it before?
8	A	No.
9	Q	When it says "applications currently on file include
10	Washingto	on, D.C., Las Vegas, San Francisco, and approximately
11	20 more	major American cities," do you have an understanding
12	as to who	at activities are being referenced there?
13	A	It would either be a station that's received the
14	satellite	e 8A receiving dish that would receive Trinity's
15	from the	satellite and broadcast it over a UHF channel, or, or
16	these sat	tellator stations that would engage in low power.
17	Q	Do you have any understanding if the references here
18	pertain 1	to applications filed by Translator TV?
19	A	I, I can't tell from this whose applications are
20	being re	ferred to.
21	Q	If I were to show you other newsletters that had the
22	reference	es both to David Espinoza and the purchase of low-
23	power bro	oadcast station for your home town, your testimony
24	would be	the same as it was with respect to this document,
25	that you	hadn't seen those references before

That's --1 Α 2 -- until counsel showed them to you? The only one that counsel showed me was the 3 one we looked at earlier, the Felicidad. So I haven't seen 4 I have no recollection of any others referring 5 anything else. 6 to solicitations for pledges for low-power stations. 7 As a board member, wouldn't it have been your 8 practice to be aware of every solicitation that was being made on behalf of Trinity Broadcasting Network? 10 If the, if the -- Well, not necessarily, because I 11 can't watch Channel 40 night and day. There are solicitations 12 that are made over that, that channel when I'm asleep. 13 Q Let me narrow my question. With respect to the 14 newsletter, wouldn't it have been your practice -- wouldn't it 15 have been -- would it have been your responsibility as a 16 director to review the written solicitations that are being 17 made here on behalf of Trinity Broadcasting Network? Not necessarily, because I, as a board member, am not 18 19 a detective. We do employ two auditors. We have a special 20 IRS auditor that goes over all the records of TBN and an 21 independent auditing firm -- we've had it from day one -- that 22 goes over all of the records of TBN to see if there is 23 anything improper in terms of its, its conduct, its conduct 24 with respect to the IRS. Now, regarding any FCC regulations 25 here, I wouldn't know it.

1 The focus of my question is not whether you were 2 aware of what happened to any money that came in. 3 of my question is on your awareness of the contents of the solicitation. You're a board member. 4 This is a solicitation 5 that's being made now twice a year by Trinity Broadcasting 6 Network. There are various projects that are noted here. You 7 would not have been aware of all the projects that are 8 represented in the newsletter? 9 To tell you the truth, I don't, I don't recall 10 receiving these newsletters, newsletters that looked like 11 this. 12 0 What do you recall receiving in terms of newsletters? 13 The -- My, my current recollection is the current --14 newsletter that'll begin with a message from, from Dr. Crouch 15 and usually contained pictures of events that have happened in 16 the past month or two. 17

- Q Well, let's look at some more and perhaps what you recall seeing will bear a closer resemblance to what we have. Could you turn to Mass Media Exhibit 53?
- 20 A Mind if I look at all of them?
- 21 Q Certainly.

18

19

- 22 A Yes, I've, I've looked at this.
- Q Had you seen this newsletter before?
- 24 A I, I don't recall seeing this before.
- 25 Q So I take it you hadn't seen previously the reference

1 | that appears on page 11, "TBN presents Felicidad," right-hand

- 2 column, second entry?
- 3 A No, I haven't.
- 4 Q Or page 12, left-hand column, second entry?
- 5 A No. I can't recall receiving a newsletter this large
- 6 at any time, this many pages.
- 7 Q Please turn to Mass Media Exhibit 56.
- 8 A I'm there.
- 9 Q And the page numbers at the bottom I would like you
- 10 to focus on would be pages -- page numbers 9 and 10, which are
- 11 | the last two pages in the exhibit.
- 12 A Yes.
- 13 | Q Your testimony would be the same, that you hadn't
- 14 | seen the reference to Felicidad which appears in the right-
- 15 hand column, second entry, on page numbered 9?
- 16 A No, I've never seen it.
- 17 Q And turning to page number 10, you would not have
- 18 seen the reference to purchasing a low-power broadcast station
- 19 for your home town?
- 20 A No.
- 21 Q Please turn to Mass Media Exhibit 66, which appears
- 22 in the second volume.
- 23 A Okay. Yes, I'm there.
- Q Now, my first concern would be on page 5, right-hand
- 25 | column, second entry.

1	A	Yes, I see it.
2	Q	And it's your testimony that you have not seen
3	previous	sly, other than your counsel pointing out to you, the
4	referenc	e to Felicidad and David Espinoza and his place in the
5	Trinity	organization?
6	A	Right. And it was this in this volume of the
7	newslett	er but in the earlier one. I've never seen this
8	before.	
9	Q	Please turn to Mass Media Exhibit 76, page 5. It's
10	in the s	same volume.
11	A	Okay.
12	Q	And the focus to or the reference to Felicidad,
13	rather,	appears on page 5, the right-hand column, second
14	entry?	
15	A	Yes.
16	Q	You hadn't seen that before?
17	A	No.
18	Q	Mass Media Exhibit 82.
19	A	Okay.
20	Q	The last page, page 12.
21	A	Yes, I see that.
22	Q	The right-hand column, third entry
23	A	I've never
24	Q	the reference to Felicidad?
25	A	Never seen it before this.

1 | O Mass Media Exhibit 89.

- 2 A Yes, I'm there.
- 3 Q Excuse me. That's not a very helpful reference.
- 4 Mass Media Exhibit 100.
- 5 A Okay.
- 6 Q And what I'd like you to concern yourself with here
- 7 is the listing of stations and studio locations that appear on
- 8 page 6.
- 9 A Okay, I see that.
- 10 Q First of all, do you recall having seen Mass Media
- 11 Exhibit 100 before?
- 12 A No, it doesn't, doesn't click anything in my memory.
- 13 Q I'll have to find one that has your picture in it.
- 14 A Very infrequent.
- 15 Q With respect to the listing of the stations and
- 16 studios that appear on page 6, do you recall having any
- 17 discussion with anyone as to what station should or should not
- 18 be listed?
- 19 A No. I don't have any, any recollection that way.
- 20 O Please turn to Mass Media Exhibit 104. And the first
- 21 | thing I'd like you to focus on is the first page.
- 22 A Okay.
- 23 Q Specifically, the fourth paragraph, beginning with
- 24 | "There is another class of station called educational."
- 25 A Yes, I see that.

1	Q	Do you recall reading this newsletter before?
2	A	No.
3	Q	The newsletter for June 1986?
4	A	No.
5	Q	Do you recall discussing with Paul Crouch what to say
6	or what i	not to say about Community Educational Television?
7	A	No. I wouldn't know what to tell him, in any event.
8	Q	Please turn to the fourth page.
9	A	Yes.
10	Q	Did you have any role in putting together the TBN
11	stations	listing that appears here?
12	A	No.
13	Q	So you had no role in telling anyone what was a TBN
14	owned and	d operated full-power station, which is the first
15	group of	stations noted?
16	A	That's right, I had no role in defining making
17	that defi	inition or listing stations.
18	Q	Have you ever seen this listing before?
19	A	Not, not this one.
20	Q	Please turn to Mass Media Exhibit 127, which appears
21	in the th	nird volume.
22	A	What, what number was that?
23	Q	127.
24	A	Okay. Okay, I've looked at it.
25	Q	Had you seen this newsletter before?

1 | A I, I have no recollection of this newsletter.

- 2 Q Turn to page 4, please.
- 3 A Yes.
- 4 Q Did you have any role in preparing or giving guidance
- 5 as to how various stations should be listed? That is, whether
- 6 it should be listed as a TBN owned and operated full-power
- 7 station or whether it should be listed as a TBN owned and
- 8 operated medium/low-power station or whether it should appear
- 9 as an affiliate station.
- 10 | A No.
- 11 Q And you had not seen this listing before?
- 12 A No, not this one.
- 13 Q Please turn to Mass Media Exhibit 148.
- 14 A I'm there.
- 15 Q Basically, what I'd like you to do is just read to
- 16 yourself the first paragraph and then tell me whether or not
- 17 you've read this newsletter before.
- 18 A No, I hadn't read that before.
- 19 Q Please turn to Mass Media Exhibit 160.
- 20 A Yes, I have it that -- I have it.
- 21 Q All right, the date is somewhat cut off, but as best
- 22 as I can tell it's for October 1987.
- 23 A Yeah.
- 24 Q And if you'd look -- Basically, it would be in an
- 25 upper right-hand portion on the first page. You have to turn

1	it side	ways in order to see that.
2	A	Yes, that appears to be October 1987.
3	Q	And I'd like you to turn to the seventh page.
4	A	Okay.
5	Q	You see where it says "TBN stations"?
6	A	Yes.
7	Q	Now, did you have anything to do did you have any
8	role in	putting together this page in terms of noting which
9	stations	were TBN stations?
10	A	No. I've never seen this page before.
11	Q	Please turn to Mass Media Exhibit 164. Have you ever
12	seen the	November of 1987 newsletter before?
13	A	Take a look at it. I believe that I have.
14	Q	Now, what I'd like you to look at is on page 2.
15	Essentia	ally, it's in the middle of the color portion of the
16	letter t	hat is signed Paul. The paragraph begins, "So,
17	partners	, what shall Jan and I do?" Do you see that? It's on
18	the seco	nd page.
19	A	Okay. Oh, I see it, yes. Yes, I see that paragraph.
20	I've rea	d it.
21	Q	You've read it? You had seen it before?
22	A	I've seen this newsletter. I don't remember that
23	reading	this paragraph.
24	Q	Do you know what it is that Paul Crouch is talking
25	about wh	en he talks about removing equipment from Beaumont and

1 | Harlingen or the possibility of removing equipment?

- 2 A No, I don't. I don't, I don't know what he's talking
- 3 about. I mean, I can only interpret that paragraph as you
- 4 | could.
- 5 Q No, I'm asking if you know.
- 6 A I have no other information than what's in print.
- 7 Q Now, Beaumont and Harlingen only refer to Community
- 8 Educational Television stations, correct?
- 9 A That's true.
- 10 Q Do you know who owned the equipment that is being
- 11 referenced here?
- 12 A I, I don't know. I think that -- It would be
- 13 | speculation as I sit here.
- 14 Q All right, please turn to Volume IV.
- JUDGE CHACHKIN: Let's take a --
- (Whereupon, a brief recess was taken from 2:55 p.m.
- 17 |until 3:07 p.m.)
- 18 JUDGE CHACHKIN: Back on the record.
- 19 BY MR. SHOOK:
- 20 Q Mr. Juggert, I had asked you to turn to Volume IV.
- 21 | The exhibit I'd like you to turn to is 184.
- 22 A Yes, I read it.
- 23 | Q Now, have you seen this newsletter before, from March
- 24 /88?
- 25 A This seems to, seems to be one that I've seen before.

1	I believe	e that I have.
2	Q	All right. I'd like you to turn to page 2.
3	A	Yes.
4	Q	There's a listing of stations that appears on page 2
5	or under	neath the heading "TV stations and souls." Do you see
6	that?	
7	A	Yes, I do.
8	Q	And the stations that are so listed are referenced
9	Channel 4	10 L.A., Channel 21 Phoenix, etcetera.
10	A	Yes.
11	Q	Do you see that?
12	A	Yes.
13	Q	Did you have anything to do with the grouping of the
14	stations	that appears in this caption?
15	A	No, I didn't.
16	Q	That you've read this before?
17	A	I don't remember seeing that particular paragraph, of
18	if I did	see it, I didn't pay any attention to it.
19	Q	You made no comment to anyone about it?
20	A	No.
21	Q	Please turn to Mass Media Exhibit 213.
22	A	I recall seeing this one.
23	Q	What I'd like you to focus your attention on is the
24	listing o	of stations that appears on the second page,
25	underneat	th the heading that reads the caption reads "Please

|pledge for your TV station." Α Yes. 2 Do you have any -- Do you recall reading this before? 3 Q Α No. 4 Did you have anything to do with the listing of 5 0 stations that appears there? 6 7 Α No, I didn't. I take it then you made no comment to anyone about 8 the stations that were listed? 10 Α No. Please turn to Mass Media Exhibit 280, which appears 11 in the next volume, Volume V. 12 Α I'm there. 13 This is the newsletter for October of 1989. Have you 14 Q seen this newsletter before? 15 I remember the title of this first article. 16 Α I'd like you to focus your attention on the third 17 0 18 page. 19 Α Yes. The first heading, "We're taking back the air waves 20 21 in Jesus's name." 22 Α Yes. Do you have -- Do you recall reading this caption and 23 0 24 the listing of stations that appears there before?

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

25

Α

No.

Q And I take it you had nothing to do with how the stations that were listed there so appeared?

- 3 A No, I, I didn't.
- 4 Q You see in this case the grouping includes Channel 40
- 5 L.A., Channel 21 Phoenix. We go down that list, Channel 44
- 6 South Texas, Channel 34 Beaumont, both of which are Community
- 7 Educational Television stations. And then we have Channel 42
- 8 Midland-Odessa. Do you see that?
- 9 A Yes.
- 10 Q And that's the National Minority station, correct?
- 11 A That would be National Minority. It depends on the
- 12 time. 1989 it would have been.
- 13 Q And you had nothing to do with the listing of this --
- 14 of these stations in this caption?
- 15 A No.
- 16 O And you hadn't read it before?
- 17 | A No, I hadn't.
- 18 Q All right. I'd like to focus on something different
- 19 now, and that's going to require going back to the first
- 20 volume.
- 21 JUDGE CHACHKIN: What exhibit number?
- MR. SHOOK: Exhibit 44.
- BY MR. SHOOK:
- 24 Q The paragraph that I'd like you to read to yourself
- 25 is the first resolved paragraph, which is the third paragraph

1	there.	
2	A	Okay, yes.
3	Q	Now, for purposes of my question, I'd also like you
4	to look	at Mass Media Exhibit 46.
5	A	Okay.
6	Q	Now, basically, what's going on here is Trinity
7	Broadcast	ting Network
8	A	Yes.
9	Q	is going to lend Trinity Broadcasting of New York
10	whatever	sums are reflected here. In the second In Mass
11	Media Ex	hibit 46 it reflects that \$1,500,000 could be loaned.
12	Do you se	ee that?
13	A	That's correct.
14	Q	Now, such loans were made by Trinity Broadcasting
15	Network t	to Trinity Broadcasting of New York, weren't they?
16	A	I do know that Yes, yes, they were.
17	Q	And there was no note or security agreement?
18	A	No, there wasn't.
19	Q	And eventually, Trinity Broadcasting of New York paid
20	back the	money that was lent to it by Trinity Broadcasting
21	Network?	
22	A	I think that would have been handled through
23	intercomp	pany transactions or intercompany transfer of funds.
24	Q	Now, there was no interest charged on the loan from
25	the netwo	ork to New York, correct?

1	A I don't believe there was.
2	Q Now, I'd next like you to turn Mass Media Exhibit 99,
3	which appears in the second volume. And the paragraph that
4	I'd like you to look at would be the resolved paragraph, which
5	is essentially the last full paragraph that appears.
6	A Yes, I see it.
7	Q Now, Trinity Broadcasting Network did in fact loan
8	Trinity Broadcasting of Texas a sum in the vicinity of
9	\$3,500,000?
10	A Yes.
11	Q And there was no note or security agreement?
12	A No, there wasn't.
13	Q There was no interest charged?
14	A Not to my knowledge.
15	Q And so far as you know, Trinity Broadcasting of Texas
16	is paying back the \$3,500,000, or whatever sum it was that
17	Trinity Broadcasting lent?
18	A The I don't know if it has been, been paid back.
19	I'd have to see the current financial statement.
20	Q But that would be your understanding, that it was
21	either being paid back or had been paid back?
22	A Yes.
23	Q Would you turn to Mass Media Exhibit 266? I think
24	that's in the fourth volume. Either fourth or fifth.
25	MR. EMMONS: Fifth volume.

That's 266? MR. JUGGERT: 1 2 BY MR. SHOOK: 3 Yes, sir. Q 4 Α Yes. 5 Now, I'm correct that when the sum of \$300,000 that Q is reflected here or an amount roughly akin to that was lent 7 by Trinity Broadcasting -- or Trinity Christian Center of 8 Santa Ana to National Minority TV that there was no note 9 relative to the lending of that sum? 10 I, I have no -- I don't believe there was a note at 11 the time the loan was made. 12 Also, at the time the loan was made, there was no 13 interest charged, correct? 14 I don't believe there was. 15 Q Now, eventually, though, the indebtedness of National 16 Minority TV to Trinity Broadcasting, or should I say Trinity 17 Christian Center of Santa Ana, was reduced to a note? 18 Α Yes, that's right. 19 Q And there's interest being charged on that note? 20 Α No. 21 Q No? 22 Α No. 23 All right. With respect to the reduction of the Q 24 amount owed or the reduction of the note, can you tell us how 25 that came about?

The -- I, I would have been contacted by Jane Duff 2 and asked to draft a note. If I may clarify myself, yesterday I testified to a note that I prepared and I was confused. note that I said that I prepared was not one that I prepared. The note I referred to yesterday was with respect to Wilmington. I didn't prepare that note. I prepared a note 6 7 for \$5 million and some odd, odd amount from -- that evidences 8 the debt of National Minority to Trinity Christian Center. 9 And that was, that was a note that was executed on or about January 1, 1993? 10 11 Α That's correct. When you asked about the interest, I 12 should clarify the fact that the note doesn't call for any 13 interest. Whether or not it's being paid, I don't know. 14 The \$5 million note? 0 15 Α The \$5 million. 16 JUDGE CHACHKIN: Did you want to know how that came 17 about or not interested? 18 MR. SHOOK: Well, Your Honor, I think we've covered 19 that with enough other people. 20 JUDGE CHACHKIN: Oh, all right. 21 MR. SHOOK: I just wanted to get this witness's 22 perspective on --23 BY MR. SHOOK: 24 Now, let's go back to the second volume, Mass Media

> FREE STATE REPORTING, INC. Court Reporting Depositions D.C. Area (301) 261-1902 Balt. & Annap. (410) 974-0947

Exhibit Number 71.

1 | A I've got that document.

Q Now, the paragraph that I would like you to look at is the one that is -- that follows the number one and it says,

4 | "Resolved, a prior resolution of this corporation," etcetera.

5 A Okay.

10

11

12

13

14

15

16

17

18

19

20

Q Now, the loan referenced there was in fact reduced to a note, wasn't it?

A I believe it was a note to TriState. If that's the case, it would have been reduced to a note.

Q Now, what, what if any distinction was there in terms of when a sum that was being lent by Trinity was going to be reduced to a note and when it wouldn't?

A The TriState Corporation, same as Sunlight and All American, were corporations that Trinity had no representation on the boards of. And on those particular corporations, security interests and notes with interest were invariably required.

Q Now, please turn to Mass Media Exhibit 70, which this time you don't have to go to another volume. It's the same volume.

21 A Okay.

Q -- exhibit.

23 A I'm there.

Q Now, you'll note that in the first paragraph -Excuse me. In the -- On the first page in the first

1 |paragraph, it's also referenced in the second page, as well as |

- 2 the third page, Translator TV, Inc., is at this combined
- 3 meeting of the boards of directors of Trinity Broadcasting
- 4 Network, Inc., and affiliated corporations. Do you see that?
- 5 A See it on the first page and on the -- Is it on the
- 6 second page, too?
- Well, on the second page, the reference is more
- 8 oblique but it, it's a continuation of what appears at the
- 9 bottom of the first page, where it talks about which directors
- 10 are appearing and who they're representing.
- 11 A Okay, yes.
- 12 Q It states that -- on the bottom of the first page
- 13 that David Espinoza, representing Translator TV, Inc., was
- 14 present, that Paul Crouch represented a number of
- 15 corporations, including Translator TV, Inc., that Jane Duff
- 16 was present and representing the same corporations as Paul
- 17 Crouch. Do you see that reference?
- 18 A Yes, I do.
- 19 Q Now, in terms of Translator TV, Inc., being present
- 20 at this meeting, would it be correct that Translator TV was
- 21 appearing at this meeting as an affiliated corporation as the
- 22 | title suggests? The title that appears in the first page of
- 23 | the minutes?
- 24 A Yes.
- 25 Q And what is it that made -- What is it in your mind

1 that made -- Let me, let me preface that question. Page 10
2 reflects that you wrote the minutes?

A Yes.

3

- Q So I take it you had something in mind when you
 Translator TV, Inc., listed here as an affiliated corporation?
- 6 A Yes.
- 7 Q And what was that?
- A Two things. One, that Translator was a corporation that anticipated or planned on broadcasting a portion of TBN's, Trinity's programming. And, secondly, that the board of Translator had representation from Trinity Broadcasting Network.
- Q Now, at this point in time, January 20, 1984, was
 Translator TV, Inc., considered -- what you considered an
 owned and operated company of Trinity Broadcasting Network?
- 16 A In 1984 I didn't. For purposes of definition, I
 17 think you could probably use that.
- 18 Q Well, at this point, on January 20, 1984, Trinity of
 19 Arizona you considered an owned and operated company, correct?
- 20 A Yes, we did.
- Q And the same would be true for Trinity of Denver, it was an owned and operated company?
- 23 A Yes.
- 24 Q Trinity of Seattle?
- 25 A Yes.

1	Q	Trinity of Oklahoma City?
2	A	Yes.
3	Q	Trinity of Florida?
4	A	Yes.
5	Q	Trinity of Indiana?
6	A	I don't know about Indiana. Indiana, yes.
7	Q	Trinity of New York?
8	A	Yes.
9	Q	How about Community Educational Television, was that
10	an owned	and operated company in January of 1984?
11	A	In the sense that the majority of the board members
12	were Trir	nity Broadcasting Network board members, but in my
13	mind that	corporation had a, had a different purpose than the
14	other cor	rporations.
15	Q	So you would view it as an affiliated corporation,
16	but not a	as an owned and operated corporation?
17	A	It, it differed from the Trinity corporations in the
18	sense tha	at it, it was one of its purposes was to engage in
19	education	al activities.
20	Q	Would the different purpose render it render
21	Community	Educational Television not an owned and operated
22	company o	of Trinity?
23	A	Well, I think there's, there's almost In my mind,
24	it's bett	er to think of three, three categories of
25	corporati	ons, the Trinity Broadcasting corporations, the